

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

IN RE LOESTRIN 24 FE ANTITRUST
LITIGATION

MDL No. 2472

Master File No.
1:13-md-2472-S-PAS

THIS DOCUMENT RELATES TO:

Third-Party Payor Actions

**THIRD-PARTY PAYOR PLAINTIFFS' UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF PROPOSED SETTLEMENT, APPROVAL OF
THE FORM AND MANNER OF NOTICE TO THE CLASS, AND
SCHEDULE FOR A FAIRNESS HEARING**

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiffs, A. F. of L. - A.C.G. Building Trades Welfare Plan, Allied Services Division Welfare Fund, City of Providence, Rhode Island, Electrical Workers 242 and 294 Health & Welfare Fund, Fraternal Order of Police, Fort Lauderdale Lodge 31, Insurance Trust Fund, Laborers International Union of North America, Local 35 Health Care Fund, Painters District Council No. 30 Health & Welfare Fund, Teamsters Local 237 Welfare Benefits Fund, and United Food and Commercial Workers Local 1776 & Participating Employers Health and Welfare Fund (collectively, "Third Party Payors" or "TPPs"), on behalf of themselves and the certified TPP Class, respectfully move this Court for an Order: (i) preliminarily approving the Settlement with Allergan, plc; Warner Chilcott Co., LLC f/k/a Warner Chilcott Co., Inc.; Warner Chilcott (US), LLC; Warner Chilcott Sales (US), LLC; Warner Chilcott plc n/k/a Allergan WC Ireland Holdings Ltd.; Warner Chilcott Holdings Co. III, Ltd.; Warner Chilcott Corp.; Warner Chilcott Laboratories Ireland Limited; Warner Chilcott Limited; Watson Laboratories, Inc.; and Watson Pharmaceuticals, Inc. (The "Warner Chilcott Defendants"); (ii) approving the Plan of Allocation; (iii) approving the proposed notice to the Class; (iv) approving the Claim Forms (v) appointing A.B. Data to serve as Claims

Administrator; (vi) appointing Bank Leumi USA to serve as Escrow Agent; (vii) setting a schedule for final approval of the Settlement; (viii) staying TPPs' litigation against the Warner Chilcott Defendants; and (ix) granting such other and further relief as may be just and proper.

In support of this Motion, TTPs rely on the Declaration of Michael M. Buchman, dated February 6, 2020, the Declaration of Linda V. Young, dated February 3, 2020 and the accompanying memorandum of law.

Dated: February 6, 2020

Respectfully submitted,

MOTLEY RICE LLC

/s/ Michael M. Buchman

Michael M. Buchman
Michelle C. Clerkin
777 Third Avenue, 27th Floor
New York, NY 10017
(212) 577-0050
mbuchman@motleyrice.com
mclerkin@motleyrice.com

Marvin A. Miller
Lori A. Fanning
MILLER LAW LLC
115 South LaSalle Street, Suite 2910
Chicago, IL 60603
(312) 332-3400
mmiller@millerlawllc.com
lfanning@millerlawllc.com

Steve D. Shadowen
Matthew C. Weiner
HILLIARD & SHADOWEN LLP
219 Congress Avenue, Suite 1325
Austin, TX 78701
(855) 344-3298
steve@hilliardshadowenlaw.com
matt@hilliardshadowenlaw.com

Sharon K. Robertson

Donna M. Evans

COHEN MILSTEIN SELLERS & TOLL PLLC

88 Pine Street, 14th Floor

New York, NY 10005

(212) 838-7797

srobertson@cohenmilstein.com

devans@cohenmilstein.com

Co-Lead Counsel for the TPP Class

Robert J. McConnell

MOTLEY RICE LLC

55 Cedar Street, Suite 100

Providence, R.I. 02903

Tel: (401) 457-7700

bmccConnell@motleyrice.com

Liaison Counsel for the TPP Class

CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2020, a true copy of the foregoing document was served on all counsel of record by electronically filing the document with the Court's CM/ECF system.

/s/ Michael M. Buchman

Michael M. Buchman